TSD File Inventory Index

Date: March 14, 2000

Initial: C M Generas

Facility Name: Iron City Ash and Deco Company (On Folded Site)

Facility Identification Number: OHT 400 014 718

A.1 General Correspondence		**B.2 Permit Docket (B.1.2)**	
A.2 Part A / Interim Status	√	.1 Correspondence	
.1 Correspondence	√	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	√	**C.1 Compliance - (Inspection Reports)**	
.3 Part A Application and Amendments	√	**C.2 Compliance/Enforcement**	
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		**C.3 FOIA Exemptions - Non-Releasable Documents**	
A.3 Groundwater Monitoring		**D.1 Corrective Action/Facility Assessment**	√
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence		.4 RFA Reports	√
.2 Closure/Post Closure Plans, Certificates, etc		**D. 2 Corrective Action/Facility Investigation**	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total – 1

.5 RFI QAPP		.6 CMI QAPP	
.6 RFI QAPP Correspondence		.7 Lab Data, Soil-Sampling/Groundwater	
.7 Lab Data, Soil-Sampling/Groundwater		.8 Progress Reports	
.8 RFI Progress Reports		**D.5 Corrective Action/Enforcement**	
.9 Interim Measures Correspondence		.1 Administrative Record 3008(h) Order	
.10 Interim Measures Workplan and Reports		.2 Other Non-AR Documents	
D.3 Corrective Action/Remediation Study		**E. Boilers and Industrial Furnaces (BIF)**	
.1 CMS Correspondence		.1 Correspondence	
.2 Interim Measures		.2 Reports	
.3 CMS Workplan		**F.1 Imagery/Special Studies** (Videos, Photos, Disks, Maps, Blueprints, Drawings, and Other Not Oversized Special Materials.)	
.4 CMS Draft/Final Report		**G.1 Risk Assessment**	
.5 Stabilization		.1 Human/Ecological Assessment ...	
.6 CMS Progress Reports		.2 Compliance and Enforcement ...	
.7 Lab Data, Soil-Sampling/Groundwater		.3 Enforcement Confidential	
D.4 Corrective Action Remediation Implementation		.4 Ecological - Administrative Record	
.1 CMI Correspondence		.5 Permitting	
.2 CMI Workplan		.6 Corrective Action/Remediation Study ...	
.3 CMI Program Reports and Oversight		.7 Corrective Action Remediation Implementation ...	
.4 CMI Draft/Final Reports		.8 Endangered Species Act	
.5 CMI QAPP		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: Documents do not go in individual folders per schedule!

NR

Eaton Corporation
Eaton Center
Cleveland, Ohio 44114
(216) 523-5000

NR

March 13, 1986

CERTIFIED MAIL P447948259
Return Receipt Requested

RCRA Activities
Region V
P.O. Box A3587
Attention: ATKJG
Chicago, Illinois 60690

EATON

Re: Eaton Corporation - Massillon, Ohio
U.S. EPA ID OHT400014718

Gentlemen:

Your letter dated January 31, 1986 concerning information of potential releases at Eaton Corporation's former facility in Massillon, Ohio has been referred to me for response.

The facility referred to has not been a treater, storer or disposer of hazardous waste and did not require interim status. An interim status notification was made inadvertently. Also, Eaton no longer is the owner of this facility. The facility was transferred from Eaton Corporation to the Massillon Development Association on July 27, 1984. Inasmuch as Eaton no longer owns this property and is not seeking a permit at this facility, it appears that the requirements of Section 3004(u) of RCRA are not applicable to this facility. I would appreciate your confirmation of our interpretation of the statutory requirements.

Very truly yours,

Thomas J. Baechle

Thomas J. Baechle

TJB/jlb

cc: J. A. Kreutzer
Engineered Fasteners-Massillon

Teletype (810) 421-8663
Telex 98-0595
Cable "EATONCORP"

to not file

Eaton Corporation
Engineered Fasteners Operations
Wire & Fastener Products Division
815 Oberlin Road S.W.
Massillon, Ohio 44646
Telephone (216) 832-1511

NO ACTION TAKEN
PENDING DECISION OR WITHDRAWAL
BY EPA STAFF
DATE 7/06/83

December 21, 1982

Certified Mail P31 9519543

Mr. Karl J. Klepitsch, Jr.
RCRA Activities
U.S. EPA Region 5
111 W. Jackson St.
Chicago, Illinois 60604

RECEIVED
JUL 05 1983
WASTE MANAGEMENT BRANCH
EPA, REGION V

EATON

RE: Permit Application Withdrawal Letter

Dear Mr. Klepitsch: OHT-400-014-718, PA, G

The Eaton Corporation - Engineered Fastener Division plant (EPA #OHT-400-014-718) recently sent a letter to the EPA asking that it's permit application be withdrawn. You asked that we have our letter signed by at least a company Vice-President. You also asked for a closure plan addressing permitted treatment, storage, or disposal operations conducted after November 19, 1980.

The permit application you received stated that waste 1,1,1 - trichlorethane and quench oil were stored and disposed of on-site. The application contained two errors. First, no hazardous wastes are or have been disposed of on-site. They have always been shipped to off-site disposers. Second, the waste quench oil does not come from a heat treatment operation where cyanides are used and it is therefore not a hazardous waste.

Eaton does not currently treat, store for more than 90 days, or dispose of hazardous waste on-site. Drums of waste 1,1,1 - trichloroethane were at one time kept on-site for over 90 days but this practice has been stopped. This is the reason we have asked that our permit application be withdrawn.

RECEIVED
7/05/83

Telefone (810) 433-9175

A closure plan is required for the 1,1,1 - trichloroethane drum storage area. The problem is no closure actions were required. Drums of waste 1,1,1 - trichloroethane are simply shipped offsite more frequently and in smaller quantities than before (within 90 days).

I hope this answers your questions. Please contact me if anything further is required.

Sincerely,

George O. Bentzel
George O. Bentzel
Manager, Mfg. Engineering

W. E. Butler
W. E. Butler
President,
Automotive Components
Group

GB/je

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

17 NOV 1982

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

Mr. George O. Bentzel, Manager-Manufacturing Engineering
Eaton Corporation-Engineer Fasteners Division-Fastener Plant
815 Oberlin Road
Massillon, Ohio 44646

RE: Permit Application Withdrawal Letter
FACILITY Eaton Corporation-Engineer Fasteners Div.-Fasteners Plt.
USEPA ID NO.: OHT 400 014 718

Dear Mr. Bentzel:

This is to acknowledge receipt of your letter of July 7, 1982, requesting the withdrawal of your Part A Hazardous Waste Permit Application. Your request was not signed and certified by an authorized person, in accordance with 40 CFR Part 122.6 (enclosed). Please resubmit your request with the correct signature and certification, so that your withdrawal can be processed. Your request must contain a detailed explanation why the application should be withdrawn. Also, if at any time, since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR Part 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found in 40 CFR Part 265 Subpart G (enclosed).

Please feel free to contact the Technical, Permits, and Compliance Section at (312) 353-2197 for assistance if you have any questions. Please refer to "Permit Application Withdrawal Letter," in all correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosures

cc: Ron Croskey, Plant Engineer
James A. Morgan, Division Manager

(STORE FOR LESS THAN 90)

RCRA ACTIVITIES

19

George O. Bentzel, Manager - Manufacturing Engineering
Eaton Corporation - Engineer. Fasteners Division - Fastener Plant
815 Oberlin Rd.
Massillon, OH. 44646

RE: Permit Application Withdrawal Letter
FACILITY: Eaton Corporation - Engineer Fasteners Division - Fastener Plant
USEPA ID NO.: OHT. 400 014 718

Dear Mr. Bentzel:

This is to acknowledge receipt of your letter of July 7, 1983, requesting the withdrawal of your Part A Hazardous Waste Permit Application. Your request was not signed and certified by an authorized person, in accordance with 40 CFR Part 122.6 (enclosed). Please resubmit your request with the correct signature and certification, so that your withdrawal can be processed. Your request must contain a detailed explanation why the application should be withdrawn. Also, if at any time, since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR Part 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found in 40 CFR Part 265 Subpart G (enclosed).

Please feel free to contact the Technical, Permits, and Compliance Section at (312) 353-2197 for assistance if you have any questions. Please refer to "Permit Application Withdrawal Letter," in all correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr.

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

OK DH 9/17

Enclosures

cc: Ron Crosley, Plant Engineer

cc: James A. Morgan, Division Manager
Eaton Corporation - World Headquarters
100 Erieview Plaza
Cleveland, OH. 44 114

SEP 2 7 1984

5HW-13

W. E. Butler, President
Automotive Components Group
Eaton Corporation
Engineered Fasteners Operations
Wire and Fastner Products Division
815 Oberlin Road S.W.
Massillon, Ohio 44646

RE: Withdrawal of Part A
FACILITY NAME: Eaton Corporation
Engineered Fasteners Div.
U.S. EPA ID #: OHT 400-014-718

Dear Mr. Butler:

This Agency has been advised by the Ohio Environmental Protection Agency (Ohio EPA) that the referenced facility is no longer operating as a storage facility under Federal rules. The facility's current status under the Resource Conservation and Recovery Act (RCRA) is that of a generator storing less than 90 days. This letter acknowledges your change in status.

Should you decide in the future to initiate storage of hazardous wastes for greater than 90 days, and such storage is consistent with the original Part A application, you must resubmit a Part A application within 30 days of such initiation.

Should you purpose to initiate storage of hazardous wastes in a manner inconsistent with the original Part A application, or to initiate the treatment or disposal of hazardous wastes, you must contact our office and the Ohio EPA at least ten days prior to such initiation. Based on the specifics of the proposed changes, we will advise you whether actual issuance of a permit is a prerequisite for such changes, or whether submittal of Part A and B of your application is sufficient. Failure to resubmit a Part A application, or to contact our office as mentioned above, would subject you to enforcement action. RCRA provides for civil penalties up to $25,000 per violation.

If you have questions, please contact Rebecca Strom of my staff, at (312) 886-6194, for assistance.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: Tom Carlisle, Ohio EPA
Cheryl Kaiser, Ohio EPA
George O. Bentzel
Manager, Manufacturing Engineering

bcc: Lisa Pierard
Part A File
Rebecca Strom

5HW-13:RStrom:PGrace:9-19-84

INITIALS DATE
STU #1 CHIEF
DIRECTOR

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only. GSA No. 0246-EPA-OT

U.S. ENVIRONMENTAL PROTECTION AGENCY

EPA NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act)*.

INSTALLATION'S EPA I.D. NO.

NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

RECEIVED
JUL 12 1982
PLEASE PLACE LABEL IN THIS SPACE
WASTE MANAGEMENT BRANCH
EPA, REGION V
RECEIVED 7/12/82

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER: F OHT400014718 T/A C 1

APPROVED:

DATE RECEIVED (yr., mo., & day): 820712

I. NAME OF INSTALLATION

EATON CORP ENG FASTENERS DIV/FAST PLT

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 815 OBERLIN RD SW

CITY OR TOWN: 4 MASSILLON — ST.: OH — ZIP CODE: 44646

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 815 OBERLIN RD SW

CITY OR TOWN: 6 MASSILLON — ST.: OH — ZIP CODE: 44646

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: 2 CROSKEY RON PLANT ENGINEER

PHONE NO. *(area code & no.)*: 216-832-1511

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 EATON CORPORATION

DETACH

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [ ] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

- [ ] A. FIRST NOTIFICATION
- [X] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: OHT400014718

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

CONTINUE ON REVERSE

FOR OFFICIAL USE ONLY

S													T/A	C
W														1
1	2	-									13	14	15	

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F001	F007				
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

- [X] 1. IGNITABLE (D001)
- [ ] 2. CORROSIVE (D002)
- [ ] 3. REACTIVE (D003)
- [ ] 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
JKreutzer	J. A. Kreutzer - Plant Manager	6-22-82

Eaton Corporation
Engineered Fasteners Operations
Wire & Fastener Products Division
815 Oberlin Road S.W.
Massillon, Ohio 44646
Telephone (216) 832-1511

13 Hold copy

December 21, 1982

Certified Mail P31 9519543

Mr. Karl J. Klepitsch, Jr.
RCRA Activities
U.S. EPA Region 5
111 W. Jackson St.
Chicago, Illinois 60604

RE: Permit Application Withdrawal Letter

OHT-400-014-718, PA, G

Dear Mr. Klepitsch:

The Eaton Corporation - Engineered Fastener Division plant (EPA #OHT-400-014-718) recently sent a letter to the EPA asking that it's permit application be withdrawn. You asked that we have our letter signed by at least a company Vice-President. You also asked for a closure plan addressing permitted treatment, storage, or disposal operations conducted after November 19, 1980.

The permit application you received stated that waste 1,1,1 - trichlorethane and quench oil were stored and disposed of on-site. The application contained two errors. First, no hazardous wastes are or have been disposed of on-site. They have always been shipped to off-site disposers. Second, the waste quench oil does not come from a heat treatment operation where cyanides are used and it is therefore not a hazardous waste.

Eaton does not currently treat, store for more than 90 days, or dispose of hazardous waste on-site. Drums of waste 1,1,1 - trichloroethane were at one time kept on-site for over 90 days but this practice has been stopped. This is the reason we have asked that our permit application be withdrawn.

Teletype (810) 433-9175

A closure plan is required for the 1,1,1 - trichloroethane drum storage area. The problem is no closure actions were required. Drums of waste 1,1,1 - trichloroethane are simply shipped offsite more frequently and in smaller quantities than before (within 90 days).

I hope this answers your questions. Please contact me if anything further is required.

EATON

Sincerely,

George O. Bentzel

George O. Bentzel
Manager, Mfg. Engineering

W. E. Butler

W. E. Butler
President,
Automotive Components
Group

GB/je

Eaton Corporation
Engineered Fasteners Operations
Wire & Fastener Products Division
815 Oberlin Road S.W.
Massillon, Ohio 44646
Telephone (216) 832-1511

July 7, 1982

CERTIFIED MAIL
9519948

Arthur S. Kawatachi
RCRA Activities
U.S. Environmental Protection Agency
Region V
P.O. Box A3587
Chicago, Illinois 60604

EATON

RE: Hazardous Waste Part A Permit Application

Dear Mr. Kawatachi:

The Eaton Corporation - Engineered Fasteners Division plant located in Massillon, Ohio (EPA #OHT-400-014-718) recently received a letter from you. The letter concerned an application for a hazardous waste permit filed in 1980. More information was requested.

The Massillon plant neither treats, stores for more than 90 days, or disposes of hazardous wastes. The permit application you received was incorrectly filled out. Please disregard it as we do not require a permit. We regret any inconvenience this may have caused you or your staff.

Should you wish to discuss this further, please contact our Corporate Staff Environmental Engineer, Ken Manchen, at (216)-523-6745.

Sincerely,

George O. Bentzel

George O. Bentzel
Manager, Mfg. Engineering

GOB/je

DICT

Teletype (810) 433-9175

Eaton Corporation
Manufacturing Services Center
32500 Chardon Road
Willoughby Hills, Ohio 44094
Telephone (216) 523-5000

PA (8-18-80)

June 25, 1982

EPA Region V
RCRA Activities
P.O. Box 7861
Chicago, IL 60680

EATON

Certified Mail P31 9519946

Dear Sir:

Enclosed you will find an updated notification of hazardous waste activity form for the Eaton Corporation plant located an Oberlin Road in Massillon, Ohio.

Sincerely,

Kenneth L. Manchen

Kenneth L. Manchen
Corporate Staff Environmental Engineer

KLM:ph

Enclosure

CC: R. Croskey (Massillon plant)

Eaton Corporation
Eaton Center
Cleveland, Ohio 44114-2584
(216) 523-5000

June 1, 1992

Ms. Patricia A. Murphy
PRC Environmental Management, Inc.
1505 PRC Drive
McLean, VA 22102

Re: **Former Eaton Corporation Engineered Fasteners Products Division Facility**
815 Oberlin Road SW, Massillon, OH
OHT 400 014 718

EATON

Dear Ms. Murphy:

This will acknowledge receipt of your letter dated May 7, 1992 regarding the above-captioned facility. Eaton is currently in the process of conducting a thorough file search for the documents you requested. Since Eaton has not owned the facility since 1984 and the documents are not retained in one central location, the gathering and reviewing of these documents will take a reasonable amount of time.

We are making every effort to comply with your request in a timely manner and will forward these documents to you as soon as our search and review process is complete. In the meantime, if you have any questions, please let me know.

Very truly yours,

Christine I. Fiffick

Christine I. Fiffick
Legal Assistant

CIF/njp

cc: Kevin Peirard, U.S. EPA Region V
Deborah Lyne, PRC
Scott E. Allbery, Eaton Corporation

Cable "EATONCORP" Telex 98-0352
Facsimile (216) 523-4787 TWX (810) 421-8664

Fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

9

EPA I.D. NUMBER: F OHT400014718 3 D

SELECT ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X		
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

SKIP: EATON CORP. ENG. FASTENERS DIV.-FASTENER PLT

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title): CROSKEY, RON-PLANT ENGINEER

B. PHONE (area code & no.): 216 832 1511

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX: 815 OBERLIN ROAD

B. CITY OR TOWN: MASSILLON

C. STATE: OH

D. ZIP CODE: 44646

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER: 815 OBERLIN ROAD

B. COUNTY NAME: STARK

C. CITY OR TOWN: MASSILLON

D. STATE: OH

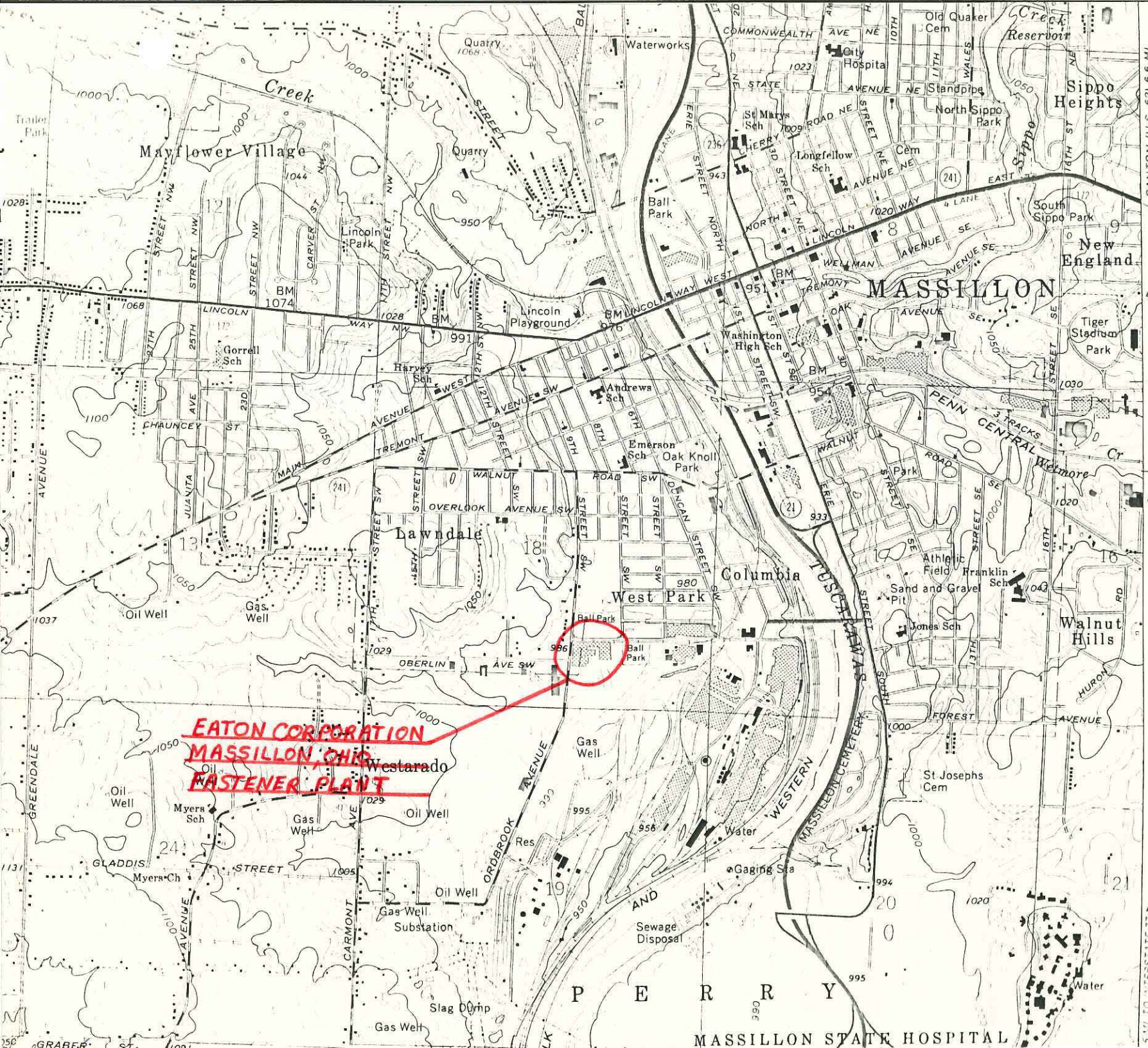
E. ZIP CODE: 44646

F. COUNTY CODE (if known):

SEP 5 1980

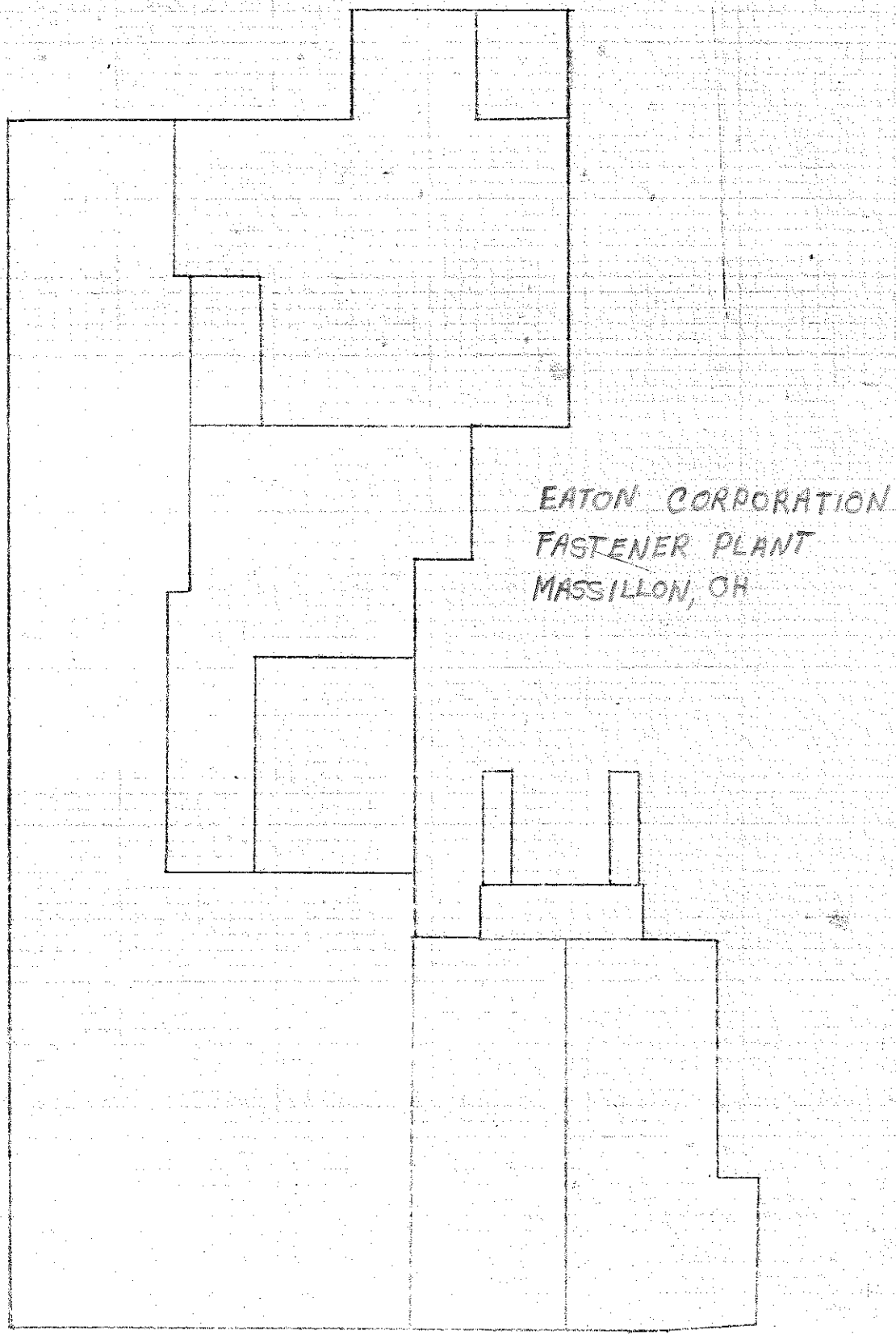
EPA Form 3510-1 (6-80)

CONTINUE ON REVERSE


7.5' SERIES
U. S.
MASSILLON, OHIO
EATON CORPORATION
MASSILLON, OHIO
FASTENER PLANT
MASSILLON
Mayflower Village
Lawndale
Columbia
West Park
Walnut Hills
Sippo Heights
New England
Perry
Creek
Reservoir
Waterworks
Old Quaker Cem
City Hospital
Standpipe
North Sippo Park
South Sippo Park
Longfellow Sch
St Marys Sch
Ball Park
Lincoln Park
Lincoln Playground
Gorrell Sch
Harvey Sch
Andrews Sch
Washington High Sch
Emerson Sch
Oak Knoll Park
Tiger Stadium Park
Athletic Field
Franklin Sch
Jones Sch
Sand and Gravel Pit
Myers Sch
St Josephs Cem
Massillon Cemetery
Gaging Sta
Sewage Disposal
Substation
Slag Dump
Massillon State Hospital
Penn Central
3 Tracks
Erie
Western
Res
Water
Gas Well
Oil Well
Quarry
Trailer Park
Cr
Creek
CANTON (U.S. 62) 6.6 MI.
TO INTERSTATE 77
47'30"
4516
4515
4513

A-2

27



1" = 80 FEET

Please print or type in the unshaded areas only (fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER: S F OHT400014718 T/A

LABEL ITEMS

- II. EPA I.D. NUMBER
- III. FACILITY NAME
- V. FACILITY MAILING ADDRESS
- VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

15

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: EATON CORP. ENG. FASTENERS DIV. - ~~FASTENER PLT.~~ & ADD FASTNER PLT

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 CROSKEY, RON - PLANT ENGINEER	216 832 1511

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX	B. CITY OR TOWN	C. STATE	D. ZIP CODE
3 815 Oberlin Rd. S.W.	4 Massillon	OH	44646

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER	B. COUNTY NAME	C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
5 815 Oberlin Rd. S.W.	Stark	6 Massillon,	OH	44646	151

P.Z.

AUG 181989

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
3452 (specify) Steel Shapes-Industrial Fasteners	(specify)

C. THIRD	D. FOURTH
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: EATON CORPORATION - WORLD HEADQUARTERS

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL, S = STATE, P = PRIVATE, M = PUBLIC (other than federal or state), O = OTHER (specify)
P (specify)

D. PHONE (area code & no.): A 216 523 5000

E. STREET OR P.O. BOX: 100 Erieview Plaza

F. CITY OR TOWN: B Cleveland

G. STATE: OH

H. ZIP CODE: 44114

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
9 N	9 P

B. UIC (Underground Injection of Fluids)	E. OTHER (specify)
9 U	9 (specify)

C. RCRA (Hazardous Wastes)	E. OTHER (specify)
9 R	9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

B

XII. NATURE OF BUSINESS (provide a brief description)

Production of a variety of fastener types including bolts, washers, nuts, retaining rings, etc. This production involves the use of large quantities of steel requiring heat treating and subsequent oil quenches as well as product oiling to prevent corrosion.

A

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
James A. Morgan Division Manager	James A Morgan	8-15-80

COMMENTS FOR OFFICIAL USE ONLY

C

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA — EPA

IRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATI
Consolidated Permits Program
(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER: S F OHT400614718 T/A

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C	YR.	MO.	DAY
8	42	01	01

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S C DUP T/A C 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G	
X-2	T03	20	E	
1	S01	20,471	G	
	D80	.0628	A	
3				
4				

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
5				
6				
7				
8				
9				
10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** — Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** — For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non—listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. **PROCESSES**

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non—listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non—listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. *(enter code)*	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE *(enter code)*	D. PROCESSES 1. PROCESS CODES *(enter)*	D. PROCESSES 2. PROCESS DESCRIPTION *(if a code is not entered in D(1))*
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				*included with above*

Continued from page 2.
NOTE: Photocopy this page before completi[ng if] y[ou h]ave more than 26 wastes to list. *Form Approved OMB No. 158-S80004*

EPA I.D. NUMBER (enter from page 1)	T/A	C	FOR OFFICIAL USE ONLY	T/A	C	
W OHT400014718		1	W DUP		2	DUP

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

LINE NO.	A. EPA HAZARD. WASTE NO. *(enter code)*	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE *(enter code)*	D. PROCESSES 1. PROCESS CODES *(enter)*				D. PROCESSES 2. PROCESS DESCRIPTION *(if a code is not entered in D(1))*
1	U226	~~5,500~~ 20750	~~K~~ K	S01	D80			
2	F012	~~14,971~~ 56482	~~G~~ K	S01	D80			
3		6436/mo						
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								
16								
17								
18								
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22								
23								
24								
25								
26								

EPA Form 3510-3 (6-80) CONTINUE ON REVERSE

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

F OHT400014718 T/A C 6

204 FIS NN

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).* B

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).* N

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
40 46 48	081 31 52

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
James A. Morgan Division Manager	James A Morgan	8-15-80

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

F OHT400014718 T/A C 6

204 FIS NN

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).* B

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).* N

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
40 46 48.0	081 31 52.0

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
James A. Morgan Division Manager	James A Morgan	8-15-80

Eaton Corporation
Engineered Fasteners Operations
Massillon Division
815 Oberlin Road, S.W.
P.O. Box 389
Massillon, Ohio 44646
Telephone (216) 832-1511

9

September 9, 1980

EPA Region V
RCRA Activities
PO Box 7861
Chicago, Illinois 50580

Gentlemen:

Enclosed are Topographic Maps showing the locations of both of Eaton's facilities in Massillon, Ohio - the Engineered Fastener Plant and the Wire Mill. Attached to them are copies of the 1st. page of the General Information Forms for these facilities, which were sent to you in August 1980. These Topographic Maps should make our application of hazardous waste permits complete.

Through an oversight on my part, we did not make a copy of the application forms sent in August dealing with the Engineered Fastener Plant at 815 Oberlin Rd. in Massillon. We have only the handwritten draft. If you could send a copy of these applications to my attention, it would be appreciated.

Very truly yours,

Not There

Gary A. Lanier

Gary A. Lanier
Manufacture Engineer

SUB

SEP 5 1980

GAL/je
(enc.)

Copy of this letter filed with "Wire Mill" Part A. OHD004217972

Teletype (810) 433-9175

27

Eaton Corporation
Engineered Fasteners Operations
Massillon Division
815 Oberlin Road, S.W.
P.O. Box 389
Massillon, Ohio 44646
Telephone (216) 832-1511

August 15, 1980

EPA Region V
RCRA Activities
PO Box 7861
Chicago, Illinois 60680

EATON

Gentlemen:

We are unable to enclose a topographic map of our plant location at this time. We are to receive such a map from U.S.G.S. within a few days and will forward it to your office at that time.

Sincerely,

G. O. Bentzel - Manager Mfg. Engineering

by

Gary Lanier

Teletype (810) 433-9175

D. Corrective Action

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

January 25, 1993

Mr. Frank Lalama
Iron City Sash and Door
815 Oberlin Road SW
P.O. Box 1166
Massillon, Ohio 44646

Re: Visual Site Inspection
Iron City Sash and Door
(Formerly Eaton Corp. Engineering
Fasteners Products Division)
Massillion, OH
ID No. OHT 400 014 718

Dear Mr. Lalama:

As indicated in the letter of introduction sent to you on April 24, 1992, the U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Francene M. Harris for

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

April 24, 1992

Mr. Frank Lalama
Iron City Sash and Door
815 Oberlin Road SW
P.O. Box 1166
Massillon, Ohio 44646

Re: Visual Site Inspection
Iron City Sash and Door
(formerly Eaton Corp. Engineered
Fasteners Products Division)
Masillion, OH
OHT 400 014 718

Dear Mr. Lalama:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for April 28, 1992, at 9:00 a.m. The inspection team will consist of Deborah Lyne and Dave Phillips of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Enclosure

cc: Dave Wertz, OEPA - Northeast District
Ed Lim, OEPA - Central Office

ATTACHMENT I

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

PRC requests that, if available, the following facility information be provided during the VSI:

1. Two copies of a detailed map of the facility
2. Facility history, including dates of operation, ownership changes, and production processes
3. Current facility operations
4. Processes that generate waste that is treated, stored, or disposed of at the facility
5. Records of disposal of wastes generated at the facility (manifests, annual reports, etc...)
6. Security at the facility
7. Information regarding geology and the uses of ground water and surface water in the area
8. Permits (air, NPDES, etc...) the facility currently holds or has held in the past and documentation of any permit violations that may have occurred
9. Records of any spills that may have occurred at the facility
10. Descriptive operational information (location, dimensions, capacity, materials of construction, etc...), dates of start-up and closure, wastes managed, release controls, and release history for each SWMU

U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006

TES 9

Technical Enforcement Support at Hazardous Waste Sites Zone III Regions 5,6, and 7

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PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

IRON CITY SASH & DOOR COMPANY (FORMERLY EATON CORPORATION) MASSILLON, OHIO OHT 400 014 718

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	OHT 400 014 718
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PRC No.	:	009-C05087OH2P
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EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Iron City Sash and Door Company (Iron City), formerly Eaton Corporation (Eaton), facility in Massillon, Ohio. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

The Iron City facility stores and customizes premanufactured doors and windows. The facility currently generates and manages nonhazardous scrap aluminum, cardboard, wood, vinyl, and fiberglass. Iron City began operating at the facility in 1984. The facility's waste management activities are currently not regulated under RCRA as they generate no hazardous waste. The facility occupies 10 acres in a mixed use area and employs about 62 people. The Iron City facility consists of a 105,000-square-foot building at 815 Oberlin Road surrounded by residences, two ballparks, and industrial buildings.

Eaton manufactured steel fasteners at the facility from 1942 to 1984. Eaton generated and managed the following waste streams: Spent 1,1,1-trichloroethane (EPA waste code F001); nonhazardous waste quenching oil; waste pickle liquor (D002); and alkali (D002). Eaton submitted a RCRA Part A permit application in 1980 for container storage and landfill disposal and then in 1982 stated that the original Part A permit application was incorrectly filled out (i.e. no landfill existed). File information indicates that Eaton requested to withdraw its RCRA Part A permit application in 1982, and change its status to a generator only. After the withdrawal was approved by EPA, the facility operated as a generator storing wastes for less than 90 days until 1984.

The PA/VSI identified the following three SWMUs at the facility:

Solid Waste Management Units

1. Dumpster
2. Former Drum Storage Area
3. Former Tank Storage Area

PRC did not note any AOCs at the facility.

No information on the location, dimensions, composition, and structure of SWMUs 2 and 3 were found in the files. After the VSI, the PRC inspection team met with a representative of the Eaton plant at 240 6th Street in Massillon who could not provide any information concerning operations at the Oberlin Road facility. PRC then requested information from Eaton Corporation headquarters representatives, who responded that information would be provided after a complete file review, which would take a reasonable amount of time. No information has been received to date.

The potential is low for a release of hazardous constituents to ground water, surface water, air, and on-site soils from SWMUs at the Iron City facility. The facility has not generated or managed any hazardous wastes or hazardous constituents on site since 1984. There were no documented disposal sites at the facility (such as landfills or impoundments) during Eaton's operations. In addition, no releases from the facility to environmental media have been documented, and both the drum and tank storage areas have been removed.

Ground water is used as a drinking water source for the area. The nearest municipal well is located 2.0 miles north of the facility. A small unnamed stream is located about 1,000 feet south of the facility. The Tuscarawas River is located 0.75 mile east of the facility, and is used for industrial intakes. Private residences are located across Ordbrook Avenue from the facility, and ballparks border the facility on the north and east sides.

PRC recommends that more information on the location, dimensions, composition, and structure of SWMUs 2 and 3 be requested from Eaton, as well as additional information on the facility's manufacturing processes and waste management practices. PRC recommends no further action for SWMU 1.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC) received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all visible SWMUs, identifying evidence of releases, initially identifying potential sampling parameters and locations, if needed, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Iron City Sash & Door Company (Iron City), formerly Eaton Corporation (Eaton), facility in Massillon, Ohio. The PA was completed on January 31, 1992. PRC gathered and reviewed information from the Ohio Environmental Protection Agency (OEPA) central and northeast district offices, and from EPA Region 5 RCRA files. The VSI was conducted on April 28, 1992. It included interviews with an Iron City representative and a walk-through inspection of the facility. Three SWMUs and no AOCs were identified at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and four inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

The Iron City facility is located at 815 Oberlin Road, S.W. in Massillon, Stark County, Ohio (latitude 40°46′48″ N and longitude 81°31′52″ W), as shown in Figure 1. The facility occupies 10 acres in a mixed use area.

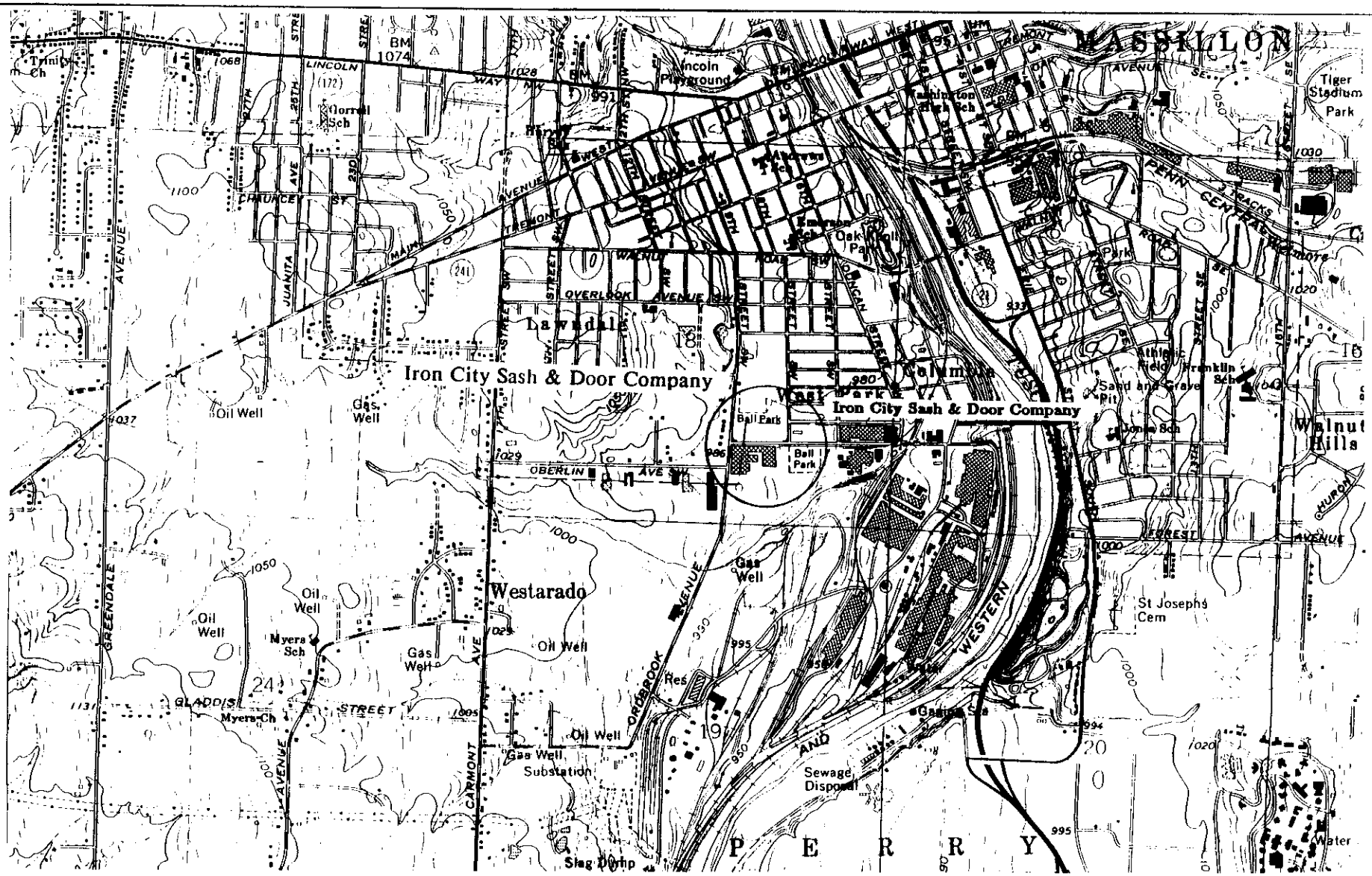
The Iron City facility is bordered on the north by Oberlin Road and a ballpark, on the west by 9th Street and Ordbrook Avenue and a few private residences, on the south by undeveloped land, an unnamed stream, and a gas well, and on the east by a ballpark.

2.2 FACILITY OPERATIONS

The Iron City facility is a warehouse for wood and aluminum doors and windows. Current operations at the site include the storage of doors and windows and a metal- and mill-workshop for customizing products. Iron City purchases premanufactured doors and windows and modifies them by adding lights and other options. The modification may involve woodworking, fiberglass laying, and aluminum welding.

The facility has operated at its current location since 1984 and employs about 62 people. The facility consists of a 105,000-square-foot building. Central State Can leases 33,000 square feet of the facility for use as a warehouse for aluminum cans. The facility generates scrap aluminum, cardboard, wood, vinyl, and fiberglass, which are accumulated in a dumpster (SWMU 1) on site and removed for off-site disposal. Iron City installed an underground diesel fuel storage tank in 1984 to fuel its delivery trucks. The tank was to be removed on the Thursday following the inspection, April 30, 1992. The same company that installed the tank was going to remove it and state representatives were scheduled to be on hand to observe the removal.

Eaton owned and operated the facility from 1942 to 1984 (Eaton, 1980). During that time, Eaton produced steel fasteners such as bolts, washers, nuts, and retaining rings. The production



Source: Modified from USGS, 1978

Iron City Sash & Door Company
Massillon, Ohio

FIGURE 1
FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

process involved heat treating and oil quenching the steel, as well as product oiling to prevent corrosion (Eaton, 1980). In 1984, Eaton moved the Oberlin Road operations to another plant at 240 4th Street in Massillon and transferred the property to the Massillon Development Association (Eaton, 1986). The Massillon Development Corporation sold the facility to Iron City Sash & Door Company in 1984.

Little documentation on facility operations during Eaton's ownership was found in the files. The facility structure has been modified by Iron City so that identification of Eaton's operations and SWMUs was not possible. PRC inspection team members spoke with an Eaton representative at the plant at 240 4th Street who could not offer any information about the operations at the Oberlin Road facility. PRC contacted Chris Fiffick at Eaton headquarters in Cleveland (Fiffick, 1992) and requested information on facility operations. PRC followed up the telephone conversation with a letter further clarifying the request (PRC, 1992). Ms. Fiffick acknowledged receipt of the request and informed PRC that Eaton was conducting a thorough file review that would take a certain amount of time, and Eaton would forward the documents after reviewing the files (Eaton, 1992). No information has been received to date.

Information contained in the files and general information on fasteners and their manufacturing processes indicate that general operations at the facility probably included heat treatment of steel with either cyanide salts or a gas-fueled furnace. The heat treatment process involves degreasing the steel with a vapor degreaser that uses 1,1,1-trichloroethane; applying heat, either with cyanide salts or a furnace; and cooling the steel in a quenching oil. The RCRA Part A permit application listed 1,1,1-trichloroethane (U226) and quenching wastewater treatment sludge from heat treatment with cyanide (F012) (Eaton, 1980), but a subsequent letter indicated that the quenching waste included in the permit was actually a nonhazardous quenching oil that did not come from a heat treatment process involving cyanide (Eaton, 1982b). Thus, the heat treatment operation at the facility probably involved a gas-fired furnace rather than a cyanide salt process. The spent 1,1,1-trichloroethane was stored in drums in a former drum storage area (SWMU 2).

In 1982, Eaton notified EPA that Eaton would be generating waste pickle liquor and alkali from an unexplained manufacturing process. The waste was stored in a former tank storage area (SWMU 3) for no more than 6 weeks (Eaton, 1982c). General information on manufacturing processes indicates that a possible source of the waste pickle liquor and the alkali was cleaning the heat-treated product in tanks with caustic acid and alkali solutions to remove scale buildup.

Facility SWMUs are identified in Table 1. No sketch of the facility layout was found in the files.

2.3 WASTE GENERATING PROCESSES

The primary waste streams generated at the Iron City facility are scrap aluminum, cardboard, wood, vinyl, and fiberglass. These wastes are generated during the manufacturing of customized doors and windows. During Eaton's ownership, the primary waste streams generated were 1,1,1-trichloroethane, quenching oil, waste pickle liquor, and alkali. These waste streams were generated during the production of steel fasteners. Wastes generated at the facility are discussed below and are summarized in Table 2.

Customized door and window manufacturing consists of taking premanufactured doors and windows and modifying them by milling, welding, and using fiberglass. This process generates nonhazardous scraps of aluminum, cardboard, wood, vinyl, and fiberglass. This waste is accumulated in SWMU 1, a dumpster. This waste is transported off site to a local area landfill by Browning Ferris.

In the past, Eaton produced steel fasteners such as bolts, washers, nuts, and retaining rings at the facility. The production process consisted of degreasing, heat treating, and quenching the steel, and possibly cleaning it with a caustic acid and alkali cleaning process. The degreasing process involved the use of 1,1,1-trichloroethane in a vapor degreaser. This process generated spent 1,1,1-trichloroethane (EPA waste code F001, incorrectly called U226 by Eaton). This waste was stored in SWMU 2, the former drum storage area. About 20,750 kg of this waste were generated annually according to the RCRA Part A permit application (Eaton, 1980). This waste was transported off site to an unspecified facility by an unspecified transporter (Eaton, 1982d).

The heat treatment process consisted, hypothetically, of a gas-fired furnace. This process would not have generated waste. The quenching process consisted, hypothetically, of dipping the heat-treated steel in tanks of quenching oil to cool the metal. This process generated nonhazardous waste quenching oil that Eaton originally identified in the RCRA Part A permit application as resulting from heat treatment with cyanide (Eaton, 1980) and then clarified as not resulting from heat treatment with cyanide (Eaton, 1982a). The manner of storage for the nonhazardous waste quenching oil was not specified in the files. About 6,436 kg of this waste

TABLE 1

SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Dumpster	No	Active
2	Former Drum Storage Area	Yes	Inactive** since 1984
3	Former Tank Storage Area	No	Inactive since 1984

* A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

** SWMUs with an "Inactive" status no longer physically exist.

TABLE 1

SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Dumpster	No	Active
2	Former Drum Storage Area	Yes	Inactive** since 1984
3	Former Tank Storage Area	No	Inactive since 1984

* A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

** SWMUs with an "Inactive" status no longer physically exist.

TABLE 2

SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit*
Scrap aluminum, cardboard, wood, vinyl, and fiberglass/NA**	Customizing doors and windows	SWMU 1
1,1,1-trichloroethane/F001	Vapor degreaser	SWMU 2
Waste quenching oil/NA**	Steel quenching tanks	Unknown
Waste pickle liquor/D002	Caustic acid cleaning tanks	SWMU 3
Alkali/D002	Cleaning tanks	SWMU 3

Note:

* Primary management unit refers to a SWMU that currently manages or formerly managed the waste.

** Nonapplicable (NA) designates nonhazardous waste.

were generated monthly according to the RCRA Part A permit application (Eaton, 1980). The disposition of the nonhazardous waste quenching oil was not specified in the files.

Scale buildup on metal fasteners may have been removed by dipping the metal in both caustic acid and alkali cleaning tanks. This process hypothetically generated the waste pickle liquor (D002) and alkali (D002). This waste was stored in SWMU 3, a former tank storage area (Eaton, 1982c). The quantity of waste generated was not documented in the files. This waste was transported off site to an unknown facility by Envirite-Liqwacon (Eaton, 1982c).

2.4 HISTORY OF DOCUMENTED RELEASES

There is no history of documented releases to ground water, surface water, air, and on-site soils at the Iron City facility. No releases were noted during the VSI.

2.5 REGULATORY HISTORY

Eaton submitted an updated notification of hazardous waste activity to EPA on June 22, 1982 (Eaton, 1982a). The original notification form was not found in the files. The facility submitted a RCRA Part A permit application on August 15, 1980 (Eaton, 1980). This application identified storage in containers (up to 20,471 gallons) and disposal in a landfill (0.0628 acres). The application listed the following wastes: 1,1,1-trichloroethane (U226); and quenching wastewater treatment sludges from metal heat-treating operations in which cyanide was used (F012).

In July 1982, Eaton responded to a request from EPA for more information by stating that the plant did not treat, dispose of, or store any hazardous waste for more than 90 days. The facility also stated that its Part A permit application was filled out in error and asked that it be disregarded (Eaton, 1982b). EPA responded to this letter with an acknowledgement of permit withdrawal request letter which requested more information and a closure plan (USEPA, 1982). In November 1982, Eaton informed OEPA that the facility would be generating waste pickle liquor and alkali, which would be stored in tanks on site for no more than 4 to 6 weeks before being removed off site for disposal. Eaton stated in the letter that because of the short duration of the storage, a permit was not required (Eaton, 1982c). In a December 1982 letter to EPA, Eaton clarified their permit withdrawal request and stated that (1) no hazardous waste was disposed of on site, because all wastes were shipped off site for disposal; (2) the waste quenching oil or sludge referred to in the Part A permit application was not from heat treatment with

cyanide, but was a nonhazardous waste quenching oil; (3) drums of 1,1,1-trichloroethane were once kept on site for over 90 days but no longer were kept over 90 days; and (4) no closure plan could be submitted because the 1,1,1- trichloroethane drum storage area was still in use, although the drums were shipped off site for disposal within 90 days (Eaton, 1982d). This clarification indicated that the landfill identified in the RCRA Part A permit application was an error. On September 27, 1984, EPA acknowledged Eaton's change in status to operate as a generator only with less-than-90-day storage (USEPA, 1984).

The facility ceased operating the former drum storage area, SWMU 2, and the former tank storage area, SWMU 3, in 1984 (Eaton, 1986). No agency or state approval of the closure was documented in the files. The facility currently generates no hazardous wastes.

In the past, Iron City and Eaton have not had RCRA compliance problems. Currently, the facility is not required to have operating air permits and no records existed in the files indicating that Eaton required air permits. The facility does not have a history of air permit compliance problems. The facility has no documented history of odor complaints from area residents.

Currently, the facility is not required to have a National Pollutant Discharge Elimination System (NPDES) permit, nor are there any records in the files to indicate that Eaton required a NPDES permit. In addition, there is no indication that the facility has been the subject of any CERCLA investigations.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the Iron City facility.

2.6.1 Climate

The climate in Stark County is temperate. The average daily temperature is 50°F. The lowest average daily temperature is 28°F in January. The highest average daily temperature is 73°F in July. The total annual precipitation for the county is approximately 36 inches. The mean annual lake evaporation for the area is about 31 inches. The 1-year, 24-hour maximum rainfall is 6.3 inches. In this county the relative humidity is lowest in summer and highest in winter. The average relative humidity throughout the year is 71 percent. The prevailing wind is from the

south. Average wind speed is highest in January at 11 miles per hour from the southwest (NOAA, 1991).

2.6.2 Flood Plain and Surface Water

The Iron City facility is not located in a 100-year flood plain (FEMA, 1982). The nearest surface water body, an unnamed stream, is located 1,000 feet south of the facility. The stream flows to the Tuscarawas River, 0.75 mile east of the facility, which is used for industrial water supply purposes (USGS, 1961; Valley, 1992).

Surface water drainage at the facility is to the south and east toward the small unnamed stream and the Tuscarawas River.

2.6.3 Geology and Soils

Site-specific information on geology and soil was not available; therefore, regional information is presented. The Iron City facility is located in the western part of Stark County, Ohio. Stark County is in the Appalachian Plateau physiographic province. Unconsolidated Pleistocene glacial deposits cover the entire county except for the southeast corner. Underlying these deposits is a series of consolidated sandstones, shales, clay, limestone, and coal of Paleozoic age. The glacial boundary separates the flat to rolling topography of the glaciated regions from the narrow bedrock ridges and steep sloping valleys in the nonglaciated southeast corner of the county. The glacial drift in the county ranges in thickness from a few feet on the bedrock ridges to 250 feet in buried valleys (Williams, 1991).

The county is situated in an interlobate area, where two glacial ice lobes, the Killbuck lobe to the west and the Grand River lobe to the east, coalesced. Glacial deposits found in Stark County can be categorized into three geomorphic types: ground and end moraines, kames and knolls, and valley trains and outwash plains. The moraines are characterized by heterogeneous unstratified clay, silt, and sand with some gravel. These deposits make up a large portion of the county. Kames or knolls are up to 100 feet high and are composed of sand and gravel, with some interbedded drift. These deposits extend northwest of Canton into Jackson and Lawrence townships. Outwash plains and valley train deposits are composed of stratified, well-sorted sands and gravels and the valley train deposits may be more than 200 feet thick in some buried valleys. Valley fill deposits are located in the Tuscarawas River valley from Massillon to Bolivar, the Sugar

Creek valley, and several of the tributaries of the Tuscarawas, including Nimishillen Creek, Little Sandy Creek, and Hugle Run. The West, Middle, and East Branches of Nimishillen Creek, north of Canton, also have extensive valley fill deposits. These deposits merge into an outwash plain approximately 3 miles wide, which is located underneath the city of Canton (White, 1982; Williams, 1991).

The Pleistocene glacial deposits have been delineated into four major stratigraphic units, each ranging from 0 to 15 feet thick. The uppermost unit of the glacial drift is the Hiram Till, located only in the northeast corner of the county. The unit is composed mainly of silty clay to slightly silty clay. The next underlying unit is the Lavery-Hayesville Till, which is generally a silty clay. The Lavery-Hayesville Till overlies the Kent-Navarre Till and is composed of a clayey or silty sand. The last underlying unit, the Titusville-Millbrook Till, is composed of clayey sand and silt (White, 1982; Williams, 1991).

Across the region, bedrock in the county dips to the southeast at approximately 14 feet per mile. Thus, the bedrock units become progressively younger in age from the northwest to the southeast. Figure 2 presents a generalized stratigraphic column of the county. The uppermost bedrock unit is the Conemaugh Group of Pennsylvanian age. The group is exposed only on ridge tops in the southeastern portion of the county. It is composed of thinly bedded shale, siltstone, and sandstone and is approximately 20 feet thick. Underlying this is the Allegheny Group of Pennsylvanian age. The group is exposed in the eastern and southern parts of the county and is composed of shale and sandstone members interbedded with clays, coals, and limestones that are approximately 280 feet thick. Within the upper portion of this group are the Upper and Lower Freeport Shale and Sandstone members that are approximately 60 and 50 feet thick, respectively. The next underlying unit is the Pottsville Group of Pennsylvanian age, which is composed of sandstone, shale, clay, and minor beds of coal. The group ranges in thickness from 225 to 500 feet. Two lower units within the group, the Massillon Sandstone Member and the Sharon Conglomerate Formation, have thicknesses of approximately 30 to 100 feet and 0 to more than 200 feet, respectively. At the top of the group, the Homewood Sandstone Member ranges from 15 to 35 feet thick. The Pottsville Group overlies the Cuyahoga Formation of Mississippian age. The formation is composed of sandstone and shale and is approximately 550 to 625 feet thick (Banks and Feldman, 1970; Williams, 1991).

The soil in the area surrounding the Iron City facility is the Chili-Wheeling-Shoals Association. This association occupies about 27 percent of Stark County. The soil in the area of

SYSTEM	GROUP	MEMBER	ROCK TYPE	THICKNESS Ft	In.
PENNSYLVANIAN	Conemaugh	Lower Mahoning	Thin bedded shale and channel-fill sandstone	20-130	
	ALLEGHENY	Upper Freeport	Coal, variable	2	
			Clay	4	
			Limestone, discontinuous	3	
		Bolivar	Coal and Clay, discontinuous		3
		Shawnee	Limestone, discontinuous		4
		Upper Freeport	Shale and Sandstone	60	
		Door Run	Shale, local		6
		Lower Freeport	Coal		10
			Clay	3	6
			Limestone, discontinuous	1	7
		Lower Freeport	Shale and Sandstone	50	
		Upper Kittanning	Coal and Clay, very local		2
			Shale	23	
		Washingtonville	Shale, discontinuous		10
		Middle Kittanning	Coal	2	4
			Clay	6	
		Leetonia	Nodular Siderite, and Coal, local		7
		Middle Kittanning	Shale	17	
		Strasburg	Coal, local		9
		Oak Hill	Clay		6
		Strasburg	Shale	11	
		Columbiana	Shale	1	2
		Lower Kittanning	Coal	2	
			Clay	6	
		Lawrence	Coal and Clay, very local		2
			Shale	16	
		Vanport	Limestone discontinuous	8	
		Clarion	Shale	50	
		Putnam Hill	Limestone and Shale	10	
		Brookville	Coal	2	
	POTTSVILLE	Brookville	Clay	4	
		Homewood	Shale and channel-fill Sandstone	15-35	
		Tionesta	Coal, discontinuous		6
			Clay, local	8	
			Shale and Sandy Shale	10	
		Upper Mercer	Limestone	2	
		Bedford	Coal, persistent, irregular	1	6
			Clay	1	6
			Shale	23	
		Lower Mercer	Limestone	2	6
		Middle Mercer	Coal, irregular	1	6
			Clay	2	
			Shale and fine grained Sandstone	15	
		Flint Ridge	Coal	1	
			Clay	2	5
			Shale	15	
		Boggs	Limestone, irregular	2	
		Lower Mercer	Coal		6
			Clay	3	
			Silty Shale	18	
		Vandusen	Coal		6
			Clay		7
			Silty Shale and Siltstone	14	
		Bear Run	Coal		3
		Massillon	Massive Sandstone or Shale	30-100	
		Quakertown	Coal	1	
			Clay	?	
			Shale	34	
		Anthony	Coal		2
		Sciotoville	Clay	5	
			Shale	30	
		Sharon (No. 1)	Coal	0-5	
			Clay	?	
		Sharon	Conglomerate and Sandstone	?-200	

Source: Modified from Williams, 1991

Iron City Sash & Door Company
(Formerly Eaton Corporation)
Massillon, Ohio

FIGURE 2
BEDROCK STRATIGRAPHY
OF STARK COUNTY, OHIO

PRC ENVIRONMENTAL MANAGEMENT, INC.

the facility is Wheeling silt loam with 2 to 6 percent slope. This soil is characterized by well-drained, level to steep soils on stream terraces, outwash plains, and kames. These soils formed in silt loam glacial material of Wisconsian age that is underlain by gravelly and sandy outwash material (USDA, 1971).

2.6.4 Ground Water

Site-specific ground-water information was not available; therefore, regional information is presented. Ground water is obtained from the unconsolidated Pleistocene glacial deposits and the bedrock. The bedrock aquifers are considered to be under a semiconfined condition because of the fracturing in the bedrock and the downward leakage between the units (Williams, 1991). Ground-water flow within the glacial deposits is generally controlled by the local topography with ground water discharging into nearby rivers and lakes. Regional ground-water flow within the bedrock probably follows the dip of the bedrock to the south (Bloyd, 1974).

The two most productive bedrock aquifers are the Sharon Conglomerate and the Massillon Sandstone of the Lower Pottsville Group (Williams, 1991). These aquifers have an estimated hydraulic conductivity of less than 10^{-3} cm/sec and yield 25 to 100 gallons per minute (gpm) (Walker, 1988). The Sharon Conglomerate and the Massillon Sandstone are most productive in the west-northwest portion of the county, with the former being found at depths ranging from 150 to 300 feet below ground surface (Walker, 1988). Overlying sandstone members in the Upper Pottsville and Allegheny Group, such as the Homewood Sandstone and the Lower and Upper Freeport Shale and Sandstone, yield less than 25 gpm. These units are most productive in the east-southeast portion of the county and occur at depths ranging from 50 to 500 feet below the ground surface. Thin shale, coal, and limestone members may contribute small yields of less than 10 gpm (Walker, 1988; Williams, 1991).

Localized sand and gravel lenses within the glacial drift typically yield 5 to 20 gpm. Valley fill deposits consisting of clay with extensive sand and gravel lenses yield up to 30 gpm. These aquifers have an estimated hydraulic conductivity of approximately 10^{-3} cm/sec and are typical of conditions in northeastern Stark County (Walker, 1988; Williams, 1991).

Aquifers associated with kames, as in the case around the city of Canton, may yield 25 to 100 gpm. These wells are generally found at depths of 85 to 125 feet below ground surface. Major buried valleys underlying portions of the Tuscarawas River, Sugar Creek, Sandy Creek, and

the city of Canton are the highest yielding aquifers in the county. These aquifers have yields of 100 to 500 gpm and have an estimated hydraulic conductivity of 10^{-2} to 1 cm/sec (Fetter, 1988; Walker, 1988; Williams, 1991). The depth of these wells range from 80 to 180 feet below the ground surface (Walker, 1988).

The facility is located in an area of Stark County in which yields of more than 500 gpm can develop. Permeable sands and gravel deposits exist in deep buried valleys. The facility is adjacent to areas that can be susceptible to the infiltration of chlorides from the Tuscarawas River (Walker, 1988).

2.7 RECEPTORS

The Iron City facility occupies 10 acres in a mixed use area in Massillon, Ohio. Massillon has a population of about 32,210. The facility is bordered on the north by Oberlin Avenue and a ballpark, on the west by 9th Street, Ordbrook Avenue and a few private residences, on the south by undeveloped land, an unnamed stream, and a gas well, and on the east by a ballpark. Facility access is controlled by a locked chain-link fence. The facility employs 62 people.

The nearest surface water body, an unnamed stream, is located 1,000 feet south of the facility. The Tuscarawas River is located 0.75 mile east of the facility and is used for industrial water supply purposes (Valley, 1992).

Ground water is used as a drinking/municipal water supply. The nearest municipal well is located 2 miles north of the facility (Valley, 1992). The ground water gradient at the facility could not be obtained; however, the regional flow is east towards the Tuscarawas River.

Sensitive environments are not located onsite; however, sensitive environments, such as the Tuscarawas River and the unnamed stream, exist within 2 miles of the facility (USDOI, 1976). Private residences are located across 9th Street from the facility and the nearest school, Emerson School, is located 0.5 mile north of the facility.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the three SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC observations.

SWMU 1	Dumpster
Unit Description:	The dumpster is located outdoors adjacent to the northwest corner of the building. The unit accumulates scrap aluminum, cardboard, wood, vinyl, and fiberglass wastes from the door and window customizing process. The unit consists of a metal dumpster resting on a paved loading dock area. The contents of the dumpster are taken off site by Browning Ferris to a local landfill.
Date of Startup:	This unit began operation in 1984 (estimate).
Date of Closure:	The unit is active.
Wastes Managed:	This unit manages nonhazardous scrap aluminum, cardboard, wood, vinyl, and fiberglass.
Release Controls:	The unit has a metal floor and metal walls as containment.
History of Documented Releases:	No releases from this SWMU have been documented.
Observations:	The unit contained scrap aluminum, wood, and cardboard waste. The unit appeared intact with no visible holes in the metal. No evidence of release was noted.

SWMU 2	Former Drum Storage Area
Unit Description:	The location, dimensions, composition, and structure of the former drum storage area are undetermined. No description existed in the files or was available from Eaton. Drums of 1,1,1-trichloroethane and possibly drums of waste quenching oil were stored for less than 90 days before being taken off site for disposal.
Date of Startup:	This unit began operation January 1, 1942 (estimate).
Date of Closure:	The unit has been inactive since July 27, 1984.
Wastes Managed:	This unit managed spent 1,1,1-trichloroethane (F001) and possibly nonhazardous waste quenching oil.
Release Controls:	The unit no longer exists; therefore, it was not possible to determine whether release controls were present.

3.0 SOLID WASTE MANAGEMENT UNITS

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Date of Startup:	This unit began operation in 1984 (estimate).
Date of Closure:	The unit is active.
Wastes Managed:	This unit manages nonhazardous scrap aluminum, cardboard, wood, vinyl, and fiberglass.
Release Controls:	The unit has a metal floor and metal walls as containment.
History of Documented Releases:	No releases from this SWMU have been documented.
Observations:	The unit contained scrap aluminum, wood, and cardboard waste. The unit appeared intact with no visible holes in the metal. No evidence of release was noted.

SWMU 2	**Former Drum Storage Area**
Unit Description:	The location, dimensions, composition, and structure of the former drum storage area are undetermined. No description existed in the files or was available from Eaton. Drums of 1,1,1-trichloroethane and possibly drums of waste quenching oil were stored for less than 90 days before being taken off site for disposal.
Date of Startup:	This unit began operation January 1, 1942 (estimate).
Date of Closure:	The unit has been inactive since July 27, 1984.
Wastes Managed:	This unit managed spent 1,1,1-trichloroethane (F001) and possibly nonhazardous waste quenching oil.
Release Controls:	The unit no longer exists; therefore, it was not possible to determine whether release controls were present.

History of Documented Releases:	No releases from this SWMU have been documented.
Observations:	The unit no longer exists. The former location of the unit could not be identified during the VSI.

SWMU 3 **Former Tank Storage Area**

Unit Description:	The location, dimensions, composition, and structure of the former tank storage area are undetermined. No description existed in the files or was available from Eaton. Waste pickle liquor and alkali were stored for not more than 6 weeks before being taken off site by Envirite-Liqwacon for treatment and disposal.
Date of Startup:	This unit began operation November 22, 1982 (estimate [Eaton, 1982c]).
Date of Closure:	The unit has been inactive since July 27, 1984.
Wastes Managed:	This unit managed waste pickle liquor (D002) and alkali (D002). Wastes from this unit were taken offsite by Envirite-Liqwacon for disposal.
Release Controls:	The unit no longer exists; therefore, it was not possible to determine whether release controls were present.
History of Documented Releases:	No releases from this SWMU have been documented.
Observations:	The unit no longer exists. The former location of the unit could not be identified during the VSI.

4.0 AREAS OF CONCERN

No AOCs were identified during the PA/VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified three SWMUs and no AOCs at the Iron City facility. Background information on the facility's location, operations, waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. AOCs are discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3 summarizes the SWMUs at the Iron City facility and recommended further actions.

SWMU 1 **Dumpster**

Conclusions: The unit manages nonhazardous scrap aluminum, cardboard, wood, vinyl, and fiberglass. The unit does not manage hazardous wastes and no releases from the unit have been documented. The unit has a low potential for releases to ground water, surface water, air, and on-site soils. The dumpster appeared in good physical condition and is located on pavement.

Recommendations: PRC recommends no further action for this SWMU.

SWMU 2 **Former Drum Storage Area**

Conclusions: The unit managed drums of spent 1,1,1-trichloroethane. The location, dimensions, composition, and structure of the former unit are unknown. The unit has not operated since July 27, 1984. No releases from this unit have been documented. The unit has a low potential for releases to ground water, surface water, air, and on-site soils, but the potential for past releases to these environmental media cannot be evaluated.

Recommendations: More information concerning the location, dimensions, composition, and structure of the unit, as well as waste management activities, should be requested from Eaton.

SWMU 3 **Former Tank Storage Area**

Conclusions: The unit managed waste pickle liquor and alkali. The location, dimensions, composition, and structure of the former unit are unknown. The unit has not operated since July 27, 1984. No releases from this unit have been documented. The unit has a low potential for releases to ground water, surface water, air, and on-site soils, but the potential for past releases to these environmental media cannot be evaluated.

TABLE 3

SWMU SUMMARY

	SWMU	Operational Dates	Evidence of Release	Suggested Further Action
1.	Dumpster	1984 to present	None	None
2.	Former Drum Storage Area	1942 to July 1984	None	EPA should send a formal information request to obtain more information on location, construction, and waste management activities of unit for further analysis
3.	Former Tank Storage Area	1982 to July 1984	None	EPA should send a formal information request to obtain more information on location, construction, and waste management activities of unit for further analysis

Recommendations: More information concerning the location, dimensions, composition, and structure of the unit, as well as waste management activities, should be requested from Eaton.

REFERENCES

Banks, P.O. and R. M. Feldman (editors), 1970. Guide to the Geology of Northeastern Ohio. Northern Ohio Geological Society, 168p.

Bloyd, R. M. Jr, 1974. Summary Appraisals of the Nation's Ground-Water Resources--Ohio Region, Geological Survey Professional Paper 813-A.

Eaton Corporation (Eaton), 1980. RCRA Part A permit application submitted to EPA, August 15.

Eaton, 1982a. Notification of hazardous waste activity submitted to EPA, June 22.

Eaton, 1982b. Letter to EPA stating that the permit application was incorrect, July 7.

Eaton, 1982c. Letter to OEPA stating that the facility will generate new wastes, November 22.

Eaton, 1982d. Letter to EPA regarding withdrawal of permit application and providing additional information, December 21.

Eaton, 1986. Letter to OEPA announcing past operations consolidation, July 14.

Eaton, 1992. Letter to PRC Environmental Management, Inc., (PRC) about providing additional documentation on facility operations, (June 1).

Federal Emergency Management Agency (FEMA), 1982. Flood Insurance Rate Map, City of Massillon, Ohio, Stark County.

Fetter, C.W., 1988. Applied Hydrogeology, 2nd edition. Merrill Publishing Co., Columbus, Ohio, 80 p.

Fiffick, Chris, 1992. Eaton Corporation, Telephone Conversation with Patricia Murphy, PRC, May 6.

National Oceanic and Atmospheric Administration (NOAA), 1991. Normals, Means, and Extremes.

PRC, 1992. Letter to Chris Fiffrick, Eaton headquarters, requesting further information on the facility operations, May 7.

U.S. Department of Agriculture (USDA), 1971. Soil Survey, Stark County, Ohio. Soil Conservation Service.

U.S. Department of Interior (USDOI), 1976. National Wetlands Inventory Map of Massillon, Ohio, Massillon Quadrangle, May.

U.S. Environmental Protection Agency (USEPA), 1982. Letter to Eaton acknowledging withdrawal request and requesting additional information and closure plan, November 17.

REFERENCES (continued)

USEPA, 1984. Letter to Eaton acknowledging change in status to generator storing less than 90 days, September 27.

U.S. Geological Survey (USGS), 1961. Topographic Map of Massillon, Ohio Quadrangle (photorevised 1970 and 1978).

Valley, Ron, 1992. Ohio Department of National Resources, Telephone Conservation with Deborah Lyne, PRC, June 23.

Walker, A. C., 1988. Ground-Water Resources of Stark County. ODNR, Division of Water, Map.

White, G.W., 1982. Glacial Geology of Northeastern Ohio. ODNR, Division of Geological Survey, Bulletin 68.

Williams, S. 1991. Ground-Water Pollution Potential of Stark County, Ohio. ODNR, Division of Water, Report No. 6, 75pp.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
OH	T4000147 18

II. SITE NAME AND LOCATION

01 SITE NAME *(Legal, common, or descriptive name of site)*	02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER
Iron City Sash & Door Co. (formerly Eaton Corp.)	815 Oberlin Road, S.W.

03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
Massillon	OH	44648	Stark	151	16

09 COORDINATES: LATITUDE	LONGITUDE
40°46'48"N	81°31'52"W

10 DIRECTIONS TO SITE *(Starting from nearest public road)*
South on Route 21, west on Oberlin Road, following Oberlin Road detour signs to facility.

III. RESPONSIBLE PARTIES

01 OWNER *(If known)*	02 STREET *(Business, mailing residential)*
Iron City Sash & Door Company	815 Oberlin Road, S.W.

03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER
Massillon	OH	44648	(216) 832-9332

07 OPERATOR *(If known and different from owner)*	08 STREET *(Business, mailing, residential)*

09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER

13 TYPE OF OWNERSHIP *(Check one)*
☒ A. PRIVATE ☐ B. FEDERAL: _____ *(Agency Name)* ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ F. OTHER _____ *(Specify)* ☐ G. UNKNOWN

14. OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*
☒ A. RCRA 3010 DATE RECEIVED: 06/22/82 (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: ___/___/___ (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION
☒ YES DATE 04/28/92 ☐ NO
BY *(Check all that apply)*
☐ A. EPA ☒ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ *(Specify)*
CONTRACTOR NAME(S): PRC Environmental Management, Inc.

02 SITE STATUS *(Check one)*
☒ A. ACTIVE ☐ B. INACTIVE ☐ C.UNKNOWN

03 YEARS OF OPERATION
1942 (BEGINNING YEAR) present (ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

1,1,1-trichloroethane, waste quenching oil, waste pickle liquor, alkali, and scrap aluminum, cardboard, wood, vinyl, and fiberglass.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

The potential is low for a release of hazardous constituents to ground water, surface water, air, and on-site soils from the facility as it no longer generates hazardous waste. Former waste management operations consisted of container and tank storage with no on-site disposal of wastes. The possibility of past releases cannot be evaluated due to a lack of data on the location and construction of the solid waste management units which formerly operated at the facility.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*

☐ A. HIGH *(Inspection required promptly)* ☐ B. MEDIUM *(Inspection required)* ☒ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF *(Agency/Organization)*	03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA	(312) 886-4448

04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
Deborah Lyne		PRC-EMI	(703) 883-8408	01/31/92 (MONTH DAY YEAR)

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Iron City Sash & Door Company
(Formerly Eaton Corporation)
Massillon, Ohio
OHT 400 014 718

Date:	April 28, 1992
Facility Representatives:	Frank Lalama, Assistant Manager, Iron City Sash & Door Company Patrick Zimmerman, Senior Environmental Engineer, Eaton Corporation
Inspection Team:	Dave Phillips, PRC Environmental Management, Inc. (PRC) Deborah Lyne, PRC
Photographer:	Deborah Lyne, PRC
Weather Conditions:	Sunny, temperature about 55°F
Summary of Activities:	The visual site inspection (VSI) began at 9:45 a.m. with an introductory meeting. The inspection team discussed the purpose of the VSI and the agenda for the visit. The facility representative then discussed the Iron City facility's past and current operations, solid wastes generated, and release history. Most of the information was exchanged on a question-and-answer basis. The VSI tour began at 10:23 a.m. The tour began with a walk through the inside of the facility, primarily warehouse space for the windows and doors, and the leased warehouse space for aluminum cans. SWMU 1, the dumpster, was located outside near the southeast corner of the facility. SWMUs 2 and 3 were not identified during the VSI because they had been removed and the building had been altered. The tour concluded at 10:45 a.m., after which the inspection team had an exit meeting with Frank Lalama. The VSI was completed and the inspection team left the facility at 10:55 a.m. The inspection team proceeded to the Eaton Corporation facility at 240 6th Street, Massillon, Ohio to meet with Patrick Zimmerman. The inspection team arrived at the Eaton facility at 11:15 a.m. and discussed the purpose of the VSI with Mr. Zimmerman. Mr. Zimmerman did not know a great deal about the operations at the Oberlin Street address, but he referred the inspection team to Chris Fiffick at Eaton World Headquarters, who would have information on the Oberlin Street facility. The inspection team left the Eaton facility at 11:40 a.m.

Photograph No. 1
Orientation: West
Description: Panoramic view of entrance to facility.

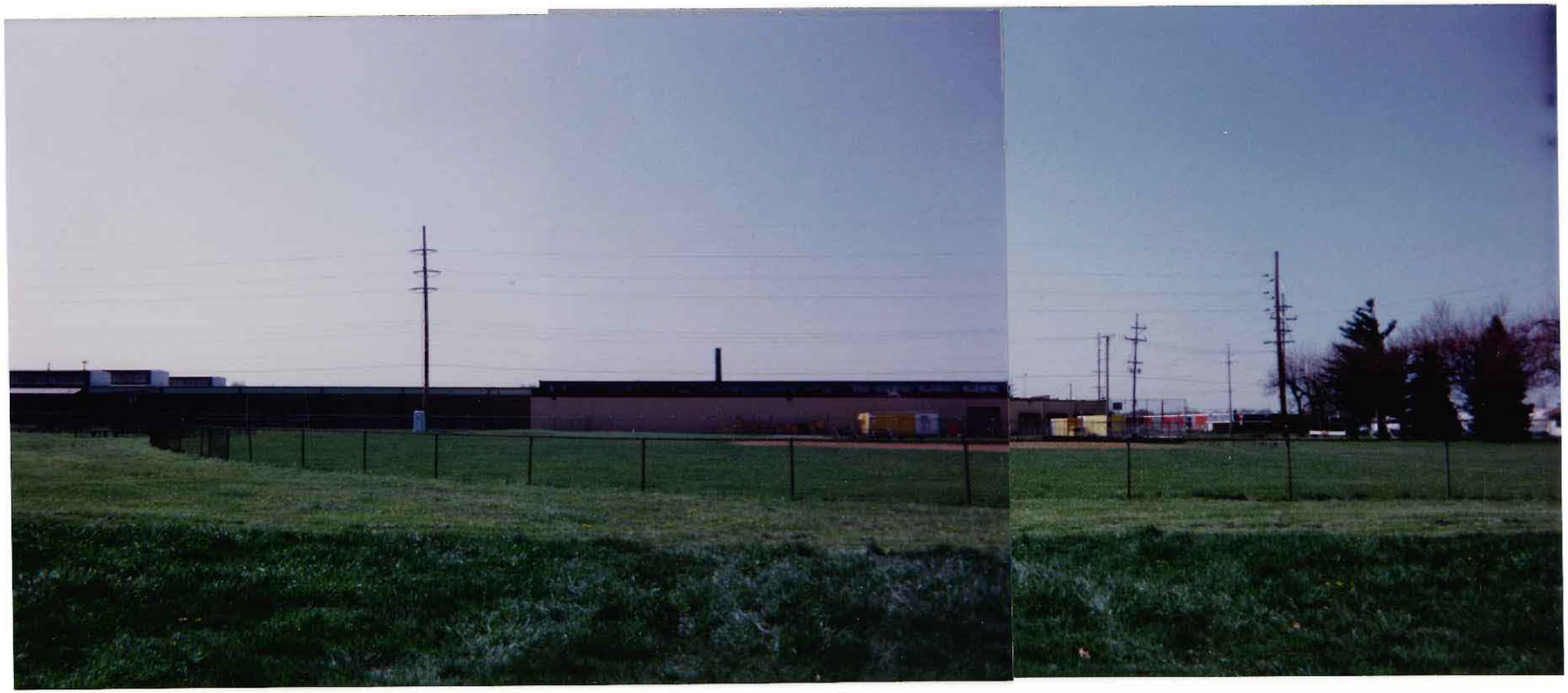
Location: N/A
Date: April 28, 1992

Photograph No. 2
Orientation: West/Northwest
Description: View of part of facility entrance.

Location: N/A
Date: April 28, 1992

Photograph No. 3
Orientation: South
Description: View of northern facade of facility.

Location: N/A
Date: April 28, 1992



Photograph No. 4
Orientation: South
Description: Panoramic view of northern facade of facility.

Location: N/A
Date: April 28, 1992

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

TR 11/28/92 62

Iron City Sash + Door Company.
(Formerly Caton)
Frank Laluna
PPC Inspections: Dave Phillips
Debbie Lyke

Sunny, mild 50's

- Warehouse + Millwork -
wood, fiberglass, aluminum
some welding - a sash and door
"jobber" take inventory ordered
doors, windows and mostly
installing lights etc [illegible]

Mission Development Corp.
"Oakwood" Property - a conduit.
Iron City bought property
from them.

- Scrap aluminum, cardboard
wood, vinyl, fiberglass, etc
only wastes produced

63 4/28/92 [initials]

BROWNING FERRIS AND CITY
PICK UP AND TAKE OFF SITE
TO A LOCAL AREA LANDFILL.
- UST STEEL TANK WILL
BE EXTRACTED ON TUESDAY
STATE WILL BE PRESENT
TO OBSERVE.
- TANK IN PLACE SINCE
1984-85. IRON CITY
PUT IT IN PLACE - SAME
COMPANY IS REMOVING
AS INSTALLED IT.
- 53 EMPLOYEES CURRENTLY
AT FACILITY
- 10 ACRE SITE
- MIXED/INDUSTRIAL/RESIDENTIAL
AREA
- CENTRAL STATE CAN [illegible]
SOURCE FROM IRON CITY

[initials] 4/28/92 64

- IRON CITY DEMOLISHED PART
OF EXISTING STRUCTURE AND
HAS MADE SEVERAL MODIFICATIONS
- WATER FROM CITY.
- DRAINS TO CITY SEWER.
- NO ASBESTOS IN BLDG
- WERE SOME TRANSFORMERS
LEFT WHEN EATON ABANDONED
THE SITE - WERE REMOVED
IN ABOUT 1984.
- 105,000 SQ FT BLDG.
- 10:20 BEGAN TOUR -
- 10:45 FINISH TOUR,
WALKED ON TOUR OF PLANT
- 10:50 DEBRIEFING. - 10:55 LEAVE.

[initials]

65 4/28/92 [illegible]

11:15 TO EATON TO TALK TO PAT ZIMMERMAN.

1984 MOVED OPERATIONS FROM OBERLIN ADDRESS TO THIS ADDRESS AT 6th AVENUE.

- HE SAYS (I.E. PAT ZIMMERMAN) THAT THE PRINCESS THEN TOOK THE [illegible] MANUFACTURING AT THE 6th ST. ADDRESS NOW MANUFACTURED FASTNERS ETC

- SOME PLATING, HEAT TREATMENT.

- ZIMMERMAN BELIEVES AN ESA WAS COMPLETED AT THE TIME OF THE PROPERTY TRANSFER. HE WILL GIVE US A NAME AT CORPORATE HEADQUARTERS TO CONTACT TO OBTAIN FURTHER INFORMATION

DOE 4/28/92 66.

PAT ZIMMERMAN CALL USE CHRIS FITTICK, EATON WORLD HEADQUARTERS · 212·583·5000 WITH THE LAW DEPARTMENT.

11:40. LEFT EATON

Frank Lalama
Assistant Manager

Iron City Sash & Door Company
815 Oberlin Rd. S.W.
P.O. Box 1166
Massillon, Ohio 44648-1166
Office: 216/832-9332

Patrick R. Zimmerman
Senior Environmental Engineer
(E.H.S.)

EATON

Eaton Corporation
Engineered Fasteners Division
240 6th Street, N.W.
Massillon, Ohio 44647-5479
(216) 832-1511

(46) Dave Phillips 4-28-92

Iron City and Sash Corp (former
Eaton Corporation) arrived at facility
at 9:45am. Met with Frank Lalave
Manufacturing Operations:
Warehouse for distribution of window
systems, do some mill work, welding
Weather conditions: 50°F, sunny
PRC inspectors: Deb Lyne and
Dave Phillips - Iron City purchased
site from Massillon from Eaton
in 1984. ~~[illegible]~~ DP
Scrap aluminum, steel, woodwaste,
cardboard, glass, and vinyl generated
Browning Ferris and City of Massillon
are contracted for the disposal of
these wastes. Currently removing
a diesel UST w/ oversight by
the state of Ohio. Never used
or generated hazardous waste [illegible]

DP 4-29-92 (47)

the site. 62 employees are currently
employed. Site is about 10 acres,
surrounded by a fence - located
in a heavily industrialized area
(in former Republic Steel Plant's
located about ½ mile from the site)
Eaton has been at the site since
the 1940's and 1950's. 50% of the
plant is original, some has been modified
by Iron City. Municipal H_2O supply;
sanitary waste waters directed to
City sewer. PCB-containing trans-
formers were removed in 1984 when
the building was renovated. Began
tour at 10:23am - 135,000 ft² is
size of building. [illegible] States Can
is a tennant at [illegible] a concrete
Warehouse [illegible]
consists of [illegible]

(145) OSP 4-28-92

is used to complete welding and cutting and other fabrication. Parts of the original building have been modified. Completed tour at 12:50 am. Left faculty at 10:55 am. Stopped at Eaton Corp. to talk with Pat Zimmerman at 11:20 am. Former Eaton Corp at Oberlin Road processed wire manufactured at another Eaton Plant. Activities at the former plant also included pickling, heat treatment of metals. Wastes are believed to have been disposed off site. Pat was not very familiar with the Oberlin faculty operations but gave us a Eaton corporate contact for further information - Chris Effick (216) - 523-5000 (Law Department)

DSP 4-28-92 (149)

dly

Frank Lalama
Assistant Manager

Iron City Sash & Door Company
815 Oberlin Rd. S.W.
P.O. Box 1166
Massillon, Ohio 44648-1166
Office: 216/832-9332

4-28-92

Patrick R. Zimmerman
Senior Environmental Engineer
(E.H.S.)

EATON

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240 6th Street, N.W.
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